

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DYSON TECHNOLOGY LIMITED)	
and DYSON, INC.,)	
)	
Plaintiffs,)	
v.)	Civil Action No. 05-434-GMS
)	
MAYTAG CORPORATION,)	
)	
Defendant.)	

PLAINTIFFS' AMENDED RULE 30(B)(6)
NOTICE OF DEPOSITION TO DEFENDANT

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiffs Dyson Technology Limited and Dyson, Inc. will take the deposition upon oral examination of Defendant Maytag Corporation through one or more of its officers, directors, managing agents, employees or other persons designated to testify on its behalf, with respect to each of the following subject matters set forth in "Attachment A" hereto.

The deposition will take place under oath and before a duly authorized notary public, or other person authorized by law to administer oaths. The deposition will be recorded by videographic and/or stenographic means. The deposition will take place at the offices of Manatt, Phelps & Phillips LLP, 7 Times Square, New York, New York, 10036, on December 1st, at 10:00 a.m., or at such other date and time as the parties may mutually agree, and shall continue from day to day thereafter until concluded.

You are requested to produce the witnesses at the agreed time and indicated place and are invited to attend.

Dated: November 20, 2006

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ Adam W. Poff

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ATTACHMENT A

DEFINITIONS

1. "ASTM" means ASTM International.
2. "Dyson" refers to the plaintiffs in this action.
3. "Hoover" refers to The Maytag Corporation and/or The Hoover Company and all of its subsidiaries, affiliates, parents, divisions and joint ventures, including all officers, employees, agents, representatives, contractors or consultants of those entities.
4. "IEC" means the International Electrotechnical Commission.
5. "Maytag" refers to The Maytag Corporation and all of its subsidiaries, affiliates, parents, divisions and joint ventures, including all officers, employees, agents, representatives, contractors or consultants of those entities.
6. "Whirlpool" refers to The Whirlpool Corporation, and all of its subsidiaries, affiliates, parents, divisions and joint ventures, including all officers, employees, agents, representatives, contractors or consultants of those entities.

DEPOSITION TOPICS

1. The nature of home conditions for floor surfaces in the U.S., including the types of dust, dirt and other materials that may be present, and the basis for such understanding.
2. Any testing that substantiates or tends to substantiate or refutes or tends to refute any of the Dyson advertising claims that Hoover has challenged in this action.
3. Hoover's strategy for responding to the introduction of Dyson upright vacuum cleaners into the United States.
4. The marketing strategy behind and the factual basis for Hoover's decision to claim "no loss of suction" in advertising for the Hoover Fusion and the Maytag Legacy vacuum

cleaners, and any testing that either substantiates or tends to substantiate or refutes or tends to refute such advertising claim.

5. The marketing strategy behind the Hoover Z and the factual basis for Hoover's assertions in its January 11, 2006 press release that:

(a) "[c]onsumers' cleaning needs have changed due to the growing trend of multiple floor surfaces within the home[;]"

(b) "[t]oday's home requires a single vacuum that can adjust to different carpet levels and transition from hard to delicate surfaces, both on and above the floor[;]" and

(c) vacuum cleaner users have voiced "major concerns" about "the need for efficient cleaning across multiple surfaces and heights and the maintenance associated with cleaning and replacing the main filter."

6. Consumer research conducted by or on behalf of Hoover concerning (a) U.S. consumers' behavior and purchasing decisions regarding vacuum cleaners; (b) the uses to which U.S. consumers put upright vacuum cleaners in the home; (c) in-home trial tests of Hoover upright vacuum cleaners in the U.S.

7. Hoover's share of the U.S. upright vacuum cleaner market, both in terms of dollar value and units sold, since 2000 and Hoover's understanding of the factors that explain that market share.

8. Hoover's annual sales, profit and loss statements and analysis, revenue analysis and projections and income generated from the sale of Hoover upright vacuum cleaners in the U.S. since 2000, including, but not limited to, the percentage of annual revenue budgeted for advertising, marketing, new product development, and research and development.

9. The nature of Hoover's U.S. marketing and advertising for its U.S. upright vacuum cleaners, including, but not limited to, the allocation of advertising dollars among various advertising markets, media, and channels.

10. Hoover's new product development strategy for U.S. upright vacuum cleaners and the dollar amount expended thereon since 2000.

11. Hoover's percentage utilization of plant or manufacturing capacity for U.S. upright vacuum cleaners since 2000.

12. Hoover's efforts to reduce manufacturing or distribution costs for its U.S. upright vacuum cleaners.

13. Any supply-chain or distribution challenges that Hoover has faced with respect to its U.S. upright vacuum cleaners since 2000.

14. The basis for Whirlpool's and/or Maytag's decision to divest itself of Hoover.

CERTIFICATE OF SERVICE

I, Adam W. Poff, hereby certify that on November 20, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Francis DiGiovanni, Esquire
James D. Heisman, Esquire
CONNOLLY BOVE LODGE & HUTZ LLP
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Wilmington, Delaware 19801

I further certify that on November 20, 2006, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and on the following in the manner indicated:

**BY E-MAIL ON NOVEMBER 20, 2006 AND
FEDERAL EXPRESS ON NOVEMBER 21, 2006**

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